

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA, ex rel.
JOHN M. GREABE,

Plaintiffs

v.

BLUE CROSS BLUE SHIELD ASSOCIATION)
and ANTHEM BLUE CROSS BLUE SHIELD)
OF NEW HAMPSHIRE)

Defendants

Civil Action No. 04-11355 RWZ

ASSENTED-TO MOTION TO ADMIT ADAM R. MORDECAI
AS COUNSEL *PRO HAC VICE*

NOW COMES Relator, John M. Greabe, by and through his attorneys, Wiggin & Nourie, P.A., and with the assent of the Defendants, and respectfully moves this Honorable Court for an order pursuant to Local Rule 83.5.3(b) admitting Adam R. Mordecai, Esq., of Wiggin & Nourie, P.A., 670 No. Commercial Street, Suite 305, P.O. Box 808, Manchester, NH, 03101, to practice before this Court *pro hac vice* on behalf of the Relator in the above-captioned matter. In support thereof, the Relator states as follows:

1. Adam R. Mordecai, Esquire, is a member in good standing of the Bar of New Hampshire.
2. The undersigned, a member in good standing of the Massachusetts Bar, will be associated with Attorney Mordecai in litigating the above-captioned action.

3. The affidavit of Attorney Mordecai is submitted in support of this Motion, along with the required filing fee of \$50.00.

4. The Defendants assent to the relief requested herein. No memorandum of law is required since the relief requested is within the discretion of this Honorable Court.

WHEREFORE, the Relator, John M. Greabe, prays that this Honorable Court:

- A. Grant the Relator's Motion to Admit Adam R. Mordecai, Esq. as Counsel *pro hac vice*; and
- B. Grant any other such relief as it deems just and proper.

Respectfully submitted,

RELATOR, JOHN M. GREABE

by his attorneys,

WIGGIN & NOURIE, P.A.

Dated: May 16, 2008

By: /s/ Richard B. McNamara
Richard B. McNamara, BBO#
670 No. Commercial Street, Ste 305
P.O. Box 808
Manchester, NH 03105
(603) 669-2211

Certificate of Service

I hereby certify that a copy of the foregoing Motion to File Reply has been forwarded to all counsel of record pursuant to the Court's rules and procedures concerning electronic filing.

/s/ Richard B. McNamara

Richard B. McNamara

00924175.DOC

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

**UNITED STATES OF AMERICA, ex rel.
JOHN M. GREABE,**

Plaintiffs

v.

**BLUE CROSS BLUE SHIELD ASSOCIATION)
and ANTHEM BLUE CROSS BLUE SHIELD)
OF NEW HAMPSHIRE)**

Defendants

Civil Action No. 04-11355 RWZ

**DECLARATION OF ADAM R. MORDECAI, ESQUIRE
SUPPORTING *PRO HAC VICE* ADMISSION**

I, Adam R. Mordecai, being duly sworn, do hereby depose and state as follows:

1. I am a member of the firm of Wiggin & Nourie, P.A., 670 No. Commercial Street, Suite 305, P.O. Box 808, Manchester, NH 03105-0808, telephone number 603-669-2211.

2. I have been admitted to practice in the State of New Hampshire since 2006.

3. I am in good standing and eligible to practice in each of the courts in which I am admitted.


4. I am not currently suspended or disbarred in any jurisdiction, nor am I the subject of any pending disciplinary matters.

5. I am familiar with the Local Rules of the United States District Court for the District of Massachusetts.

I declare the foregoing to be true and accurate statements based on the above-referenced information and my belief.


Signed under pains and penalties of perjury:

May 16, 2008
Date


Adam R. Mordecai

STATE OF NEW HAMPSHIRE
COUNTY OF HILLSBOROUGH

Personally appeared before me this 16th day of May ____, 2008, the above-named Adam R. Mordecai, who made oath that the foregoing statements by him are true to the best of his knowledge and belief.


Justice of the Peace / Notary Public

00924178.DOC

JANE C. BOUDLE, Notary Public
My Commission Expires April 18, 2012